

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

Lynsa Harris Williams

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-
Sunlife Financial

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

**Complaint for Employment
Discrimination**

Case No. 20-CV-00058-GAF
(to be filled in by the Clerk's Office)

REQUEST FOR TRIAL BY JURY

Plaintiff requests trial by jury. Yes No

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address

*Lynne Hobbs-Williams
722 Walnut #301
Kansas City MO 64106
JACKSON
8165890133
LynneWilliams@gmail.com*

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name
Job or Title
(if known)
Street Address
City and County
State and Zip Code
Telephone Number
E-mail Address
(if known)

*Sunlife Financial
3323 Grange Avenue
Kansas City Jackson
Missouri 64106*

Defendant No. 2

Name
Job or Title
(if known)
Street Address
City and County

State and Zip Code _____

Telephone Number _____

E-mail Address _____
(if known)

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name _____
Street Address _____
City and County _____
State and Zip Code _____
Telephone Number _____

*Sunlife Financial
3323 Grand Avenue
Kansas City MO 64108
JACKSON*

II. Cause of Action

This action is brought for discrimination in employment pursuant to (*check all that apply*):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)



Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)

Other federal law (*specify the federal law*): _____

Missouri Human Rights Act, Missouri Revised Statute § 213.055

Other state law (*specify, if known*): _____

Relevant city or county law (*specify, if known*): _____

III. Administrative Procedures

A. Did you file a charge of discrimination against Defendant(s) with the Equal Employment Opportunity Commission or other federal agency?

Yes Date filed: 10/17/19
 No

Attach copy of the charge to this Complaint

B. Have you received a Notice of Right-to-Sue Letter from the Equal Employment Opportunity Commission?

Yes No

If yes, please attach a copy of the letter to this Complaint.

C. Did you file a charge of discrimination against Defendant(s) with the Missouri Commission on Human Rights?

Yes Date filed: _____
 No

Attach copy of the charge to this Complaint

D. Have you received a Notice of Right-to-Sue Letter from the Missouri Human Rights Commission?

Yes No

If yes, please attach a copy of the letter to this Complaint.

E. If you are claiming *age discrimination*, check one of the following:

60 days or more have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission.

fewer than 60 days have passed since I filed my charge of age discrimination with the Equal Employment Opportunity Commission

IV. Statement of Claim

A. The discriminatory conduct of which I complain in this action includes (*check all that apply*):

Failure to hire me.
 Termination of my employment.
 Failure to promote me.
 Failure to accommodate my disability.
 Unequal terms and conditions of my employment.
 Retaliation.
 Harassment/Hostile Work Environment
 Other acts (*specify*): _____

(Note: Only those grounds raised in the charge filed with the Equal Employment Opportunity Commission can be considered by the federal district court under the federal employment discrimination statutes.)

B. It is my best recollection that the alleged discriminatory acts occurred on the following date(s):

*These acts have been 2016 AND ARE
ON GOING*

C. I believe that defendant(s) (*check one*):

is/are still committing these acts against me.
 is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (check all that apply and explain):

<input checked="" type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input type="checkbox"/>
<input checked="" type="checkbox"/>
<input checked="" type="checkbox"/>

race Black

color _____

gender/sex _____

religion _____

national origin _____

age. My year of birth is 1955. (Give your year of birth only if you are asserting a claim of age discrimination.)

disability or perceived disability (specify disability)

DISEASE THAT REQUIRES ME TO GO TO THE BATHROOM
WHEN MY BODY IS IN ACES

E. Write a short and plain statement of FACTS that support your claim. Do not make legal arguments. You must include the following information:

- What happened to you? - I'm harassed for my time in the bathroom stating it hurt my back per hour
- What injuries did you suffer? HUMILIATION-DEGRADING DEHUMANIZING
- Who was involved in what happened to you? - MANAGEMENT
- How were the defendants involved in what happened to you? THEY HAD AN INDIVIDUAL MANAGER WHO HAD THE JOB OF WATCHING THE TELEPHONE
- Where did the events you have described take place? I WOULD RECEIVE MESSAGES ACROSS THE COMPUTER SYSTEM ASKING ME WHAT I WENT ON THE TELEPHONE IN THE WORKPLACE & HOME
- When did the events you have described take place?

If more than one claim is asserted, number each claim and write a short and plain

statement of each claim in a separate paragraph. Attach additional pages if needed.

② SINCE MY FIRST REVIEW I EXPLAINED TO
I WANTED TO BE TRAINED WITH FELTS OF THE JOB.
I WAS TOLD I WOULD BE TRAINED, AND I WAS TRAINED
IN A GROUP WITH (2) OTHERS THAT SAME SINCE
ONE ON TO OTHER DEPARTMENT (3) ON GUE
S AND 13. LN 2018 I REQUESTED TO WORK
OVER TIME, I WAS TOLD I HAD NOT BEEN
FORMALLY TRAINED AND DENIED THE POSITION.
IN 2019 I LEARNED 2 YOUNGER WHITE GIRLS
RECEIVED ALL OF THE TRAINING I HAD BEEN
REQUESTING. THEY WERE GIVEN ACCESS TO ALL
SYSTEMS TO COMPLETE THE TRAINING.

③ I have been harassed about the volume of my voice on the telephone because the person on the other end is unable to hear me. I have been repeating the telephone since December of 2017.

④ I have been harassed about the length of my days during 2019 the same decreases I have been working since 2016.

V. Relief

As relief from the allegations of discrimination as stated above, Plaintiff prays that the court grant the following relief to Plaintiff: (check any and all that apply)

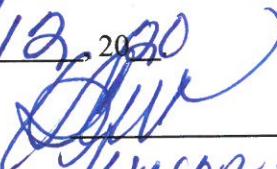
- Defendant be directed to employ Plaintiff
- Defendant be directed to re-employ Plaintiff
- Defendant be directed to promote Plaintiff
- Defendant be directed to _____
- Monetary damages (please explain): *to cover humiliation-shame*
- As additional relief to make Plaintiff whole, Plaintiff seeks (please specify and explain): *dehumanization denigration I have suffered. Talking to management has not helped. The continued costs per hour is used against you to prevent promotions working overtime pay increases.*

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 1/18/20

Signature of Plaintiff 

Printed Name of Plaintiff Lynda Jones Williams